

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE, TENNESSEE

PGA SERVICE CORPORATION,

Case No. 3:17-cv-01334

Plaintiff,

vs.-

JUDGE TRAUGER

ALL WEB LEADS, INC., KATCH,
LLC, and QUOTEWIZARD.COM,
LLC,

Defendants.

**DEFENDANT QUOTEWIZARD.COM, LLC'S NOTICE OF JOINDER IN DEFENDANT
ALL WEB LEADS, INC'S MOTION FOR A MORE DEFINITE STATEMENT**

Defendant QuoteWizard.com, LLC ("QuoteWizard") hereby joins defendant All Web Leads, Inc.'s ("AWL's") Motion for a More Definite Statement, and the arguments and authorities found therein. Plaintiff's allegations of infringement against AWL are substantively identical to the allegations it has asserted against QuoteWizard, as both are based on the ill-defined "the GENERAL Marks" that both AWL and QuoteWizard have allegedly infringed. Plaintiff similarly does not identify what trademarks fall within the definition of "the GENERAL Marks," nor which of those trademarks QuoteWizard allegedly infringed. Accordingly, Plaintiff's allegations are inadequate for the same reasons set forth in AWL's Motion for a More Definite Statement.

Because Plaintiff has not adequately defined the marks at issue (including a failure to identify all registrations and domain names included within "the GENERAL Marks" that QuoteWizard has allegedly infringed), QuoteWizard joins AWL's Motion for a More Definite Statement and respectfully requests that the Court require a more definite statement sufficient to

put QuoteWizard on notice of Plaintiff's alleged trademark rights that it believes QuoteWizard has infringed.

Respectfully submitted,

s/ Jenna Harris
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served on the following through the Court's ECF system this 25th day of January 2018.

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